Seattle

October 6, 2022

Chair Anthony Doan, State Building Code Council
PO Box 41449
Olympia WA 98504-1449

Dear Chair Doan,

The City of Seattle strongly supports the passage of the 2021 Residential Energy Code proposed updates. We believe that strong building codes are one of the most cost-effective ways of ensuring that the buildings we construct today will support healthy, livable communities in the future. Specifically, the code will:

Reduce climate pollution and support climate adaptation. In Seattle, 35% of emissions come from the building sector, and that number is rising. Between 2016 and 2018 we saw an 8.3% increase in building emissions, with most of that increase in the residential sector. Statewide, buildings represent approximately one quarter of Washington's greenhouse gas emissions. Both the state and City of Seattle have ambitious targets to significantly reduce this climate pollution. To achieve these ambitious climate targets and protect residents, we must build all-electric homes by installing measures such as heat pumps for water and space heating, restricting gas in new Washington residences and raising efficiency standards. It is imperative that we stop locking in fossil fuels in our homes and rely more on clean and efficient electric heating and cooling that will ultimately save households on energy costs and provide important cooling benefits, which is increasingly more important as we continue to see an increase in the number of days over 80 degrees as well as more incidence of wildfire smoke.

Support healthier indoor air quality: The code proposal includes important cooking ventilation requirements that would reduce harmful pollutants including cancer-causing carcinogens and nitrogen dioxide that can trigger asthma and exacerbate existing respiratory problems. The proposal also reduces risks of carbon monoxide poisoning by limiting fossil fuel use for space and water heating.

Reduce safety risks and support resilience in a natural disaster: Homes built without fossil fuels have no risk of gas explosions, which can devastate homes, businesses, and livelihoods, such as what we saw in the Seattle Greenwood neighborhood in 2016. Further, after a natural disaster such as a major earthquake, it can take longer for the gas service to be restored in a home compared to electricity. In its report submitted to the Office of Pipeline Safety after the Northridge, CA quake in 1994, Southern California Gas Company reported that thousands of homes were still without gas one month or more after the quake.[1] Further, the outage required hundreds of utility workers to restore gas service.

Build on proven technology that is cost-effective. The technology that is being proposed is not new, in fact, many of the homes being built in Washington state are already employing heat pump technology[2]. And while more efficient HVAC has been cited as being more expensive, it is important to factor in the

[1] Improving Natural Gas Safety in Earthquakes (ca.gov)
[2] Northwest Energy Efficiency Alliance (NEEA) | Washington Residential…

costs of separate cooling equipment that would be needed if a gas furnace were installed. An added benefit of heat pumps is that they provide heating and cooling with one piece of equipment. And, because the proposed code aligns/exceeds the ENERGY STAR home 3.2 version, builders will be able to access a $2,500 tax credit through the recently enacted Inflation Reduction Act, which will help offset any increase in upfront equipment costs.

For these reasons, we urge the State Building Code Council to pass the full package of proposed 2021 Residential Energy Code updates; the package represents a commonsense approach in helping protect our environment and public health. We appreciate the opportunity to comment and thank you and members of the State Building Code Council for your important work.

Sincerely,

Jessyn Farrell
Director
Office of Sustainability & Environment

Nathan Torgelson
Director
Department of Construction & Inspections